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13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 Gustavo A. Iglesias,

16 Plaintiff,

17 v.

18 Trans Union LLC.; Experian Information
19 Solutions Inc.; Equifax Information Services
20 LLC; Ally Financial Inc.,

21 Defendants.
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Case No.: 2:20-cv-02099-GMN-NJK

**ORDER GRANTING STIPULATION TO
EXTEND DISCOVERY DEADLINES**

(First request)

1 Gustavo A. Iglesias; Trans Union LLC.; Experian Information Solutions Inc.; and
2 Equifax Information Services LLC; ("Plaintiff," "Trans Union," "Experian," and "Equifax"
3 respectively or jointly as the "Parties"), by and through their respective counsel, hereby stipulate
4 to modify the Court's Discovery Plan and Scheduling Order as follows:

5 Pre-Trial Order: The parties shall file a joint pretrial order no later than Oct 8, 2021 or
6 thirty (30) days after the date set for filing dispositive motions. In the event that dispositive
7 motions are filed, the date for filing the Joint Pretrial Order shall be suspended until thirty (30)
8 days after the Court enters a ruling on the dispositive motions, or otherwise by further order of
9 the Court.

10 Pursuant to LR 26-3, good cause exists to amend the Scheduling Order. The Parties have
11 diligently pursued discovery but need additional time to complete responses to discovery requests,
12 complete depositions, and possibly amend pleadings or add parties.

13 **A. Statement of Completed Discovery**

14 Trans Union served Plaintiff with interrogatories, requests for production of documents,
15 requests for admission and a notice of deposition on Jan 11, 2021.

16 Plaintiff served interrogatories, requests for production of documents, requests for
17 admission, and deposition notices to all Defendants on Feb 2, 2021.

18 Equifax served Plaintiff with interrogatories, requests for production of documents, and
19 requests for admission on Feb 3, 2021.

20 Experian served Plaintiff with interrogatories, requests for production of documents, and
21 requests for admission on Feb 8, 2021.

22 Plaintiff responded to Trans Union's discovery requests on Feb 24, 2021. Plaintiff needs
23 additional time to respond to Experian and Equifax's discovery requests. Equifax, Experian, and
24 Trans Union need additional time to respond to Plaintiff's discovery requests.

25 **B. Description of Remaining Discovery**

26 Pursuant to LR 26-3(b), the parties request additional time to respond to written discovery
27 requests, take depositions, and disclose experts.

C. Reasons Why Remaining Discovery Was Not Completed by Current Deadlines

Pursuant to LR 26-3(c), the reason the remaining discovery was not complete within the time limits set by the discovery plan is Plaintiff intends to disclose an expert but needs additional time to obtain written discovery responses and take Defendants' depositions before the expert can be properly disclosed based on the information Plaintiff expects to learn from discovery responses and verify through Defendants' depositions. Plaintiff also requests an extension to the deadlines to amend the pleadings and add parties because he wishes to preserve those rights until after he has obtained all written discovery responses and learned what information, if any, would inform amended pleadings or require adding parties.

Additionally, Trans Union's counsel is located in the Dallas-Fort Worth, Texas area and suffered extensive power outages due to the extreme winter storm in February 2021, precluding the ability to access PDF files, work, and communicate effectively on the case for the duration of the historic storm until power was restored. Lastly, Trans Union's counsel will be getting married in April 2021 which will necessitate time both before and after for the wedding and honeymoon and counsel will not be available to schedule or complete depositions during that time.

Pursuant to LR 26-3(d), the Parties' proposed discovery schedule is listed below:

1. Amend pleadings: from Mar 9, 2021, to May 10, 2021;
2. Expert disclosures: from Apr 8, 2021 , to June 9, 2021;
3. Rebuttal disclosures: from May 10, 2021 , to July 9, 2021;
4. Discovery cutoff date: from Jun 7, 2021 , to Aug 9, 2021;
5. Dispositive motions: from Jul 7, 2021, to Sep 8, 2021.

Pre-Trial Order: The parties shall file a joint pretrial order no later than Oct 8, 2021 or thirty (30) days after the date set for filing dispositive motions. In the event that dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until thirty (30)

1 days after the Court enters a ruling on the dispositive motions, or otherwise by further order of
2 the Court.

3 This is the Parties' first request for an extension of these deadlines.

4 IT IS SO ORDERED.

5 Dated: March 19, 2021

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UNITED STATES MAGISTRATE JUDGE
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